

EXHIBIT 2

FAX

Fort Meigs Wellness
and Behavioral
Health

975 Commerce Drive
Perrysburg OH 43551
Tel: 419-874-8257
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To: Katherine Swift
Company: Buckt Buck, LLP
Fax: (312) 494-4440
Tel: _____
Subject: Deborah Bish

From: Richard Hoernemann
Ref. No. _____
Pages: 4 (incl. cover)
Date: 10/14/19

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FORT MEIGS WELLNESS & BEHAVIORAL HEALTH
975 COMMERCE DRIVE, PERRYSBURG, OH 43551
(419) 874-8257- VOICE - (419) 873-7584 - FAX

10/14/19

Katherine Swift
BartlitBeck, LLP
Courthouse Place
54 W. Hubbard Street
Suite 300
Chicago, IL 60654

CONFIDENTIAL

Re: Deborah A. Bish
dob: 1/28/54

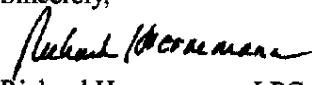
Dear Ms. Swift:

Accompanying please find a letter from Kathryn Castorena, a nurse practitioner under Kiran Lagisetty, M.D., who performed thoracotomy and lobectomy procedures on Ms. Bish on 2/19/19, documenting her post-operative complications.

As you know, Ms. Bish has been subpoenaed to provide testimony in a suit against her employer, Walgreens, relative to its role in the distribution of opioid medications. Her deposition in this matter predated her surgery, reportedly enduring eight hours. She found this to be extremely stressful, thus given the change in her medical status, she doubts that she will again be able to endure the expected day-long questioning without experiencing pain. Thus, she is requesting to be excused on medical grounds from providing testimony in this trial.

I trust this information may suffice yet I remain available if I can be of further assistance in this case.

Sincerely,


Richard Hoernemann, LPC
Counselor

10/11/2019 2:48:44 PM

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Michigan Medicine Thoracic Surgery Clinic |
Taubman Center
Floor 2 Reception C
1500 E Medical Center Dr Spc 5344
Ann Arbor MI 48109-5344
Telephone: 734-936-5738
Fax: 734-615-2656

MICHIGAN MEDICINE
UNIVERSITY OF MICHIGAN

Rick Hoernemann
975 Commerce Drive
Perrysburg OH 43551

Patient name: Deborah Bish
Date of birth: 1/28/1954

Dear Mr. Hoernemann:

Ms. Deborah Bish is a 65 y.o. woman with history of ocular histoplasmosis and confluent consolidation within the superior segment of the left lower lobe, focal bronchiectasis and bronchial lithiasis, which was symptomatic with recurrent large volume hemoptysis despite two prior IR embolizations. On 2/19/2019 she underwent a left thoracoscopic converted to open left thoracotomy for lower lobectomy. She was able to be discharged home on 2/25/2019. Her postoperative recovery has been complicated by intercostal neuralgia and post-thoracotomy pain syndrome. She experiences worsening of her symptoms with increased stress and poor sleep. Her pain is being treated with gabapentin three times daily, although she continues to have limitations due to pain.

I hope this summary provides you the assistance you need.

Please contact our office should you have any questions.

Sincerely,

Kathryn Mari Castorena, NP

CC:
Deborah A. Bish